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*LAVELLE*  
Ms. ~~Lavelle~~:

On page 8 of the Proposed Plan for Public Comment on OU-2 just above "Remedial Action Objectives", it simply states and I quote" Ecological Risk has not yet been addressed for OU-2. EPA will be conducting a comprehensive assessment of Ecological Risk as Part of the OU #3 work (the mine site) that will address ecological risk for OU-2."

Ecology is defined as the (Scientific) relationship between the Environment and any living organism (Plant or Animal.)

As you know, we have common Tansy ( a noxious weed in Montana) progressing up the Rainy Creek corridor alongside the Rainy Creek Road and creek. When you were made aware of this there were biological studies underway which would be adversely impacted through the use of herbicides. NO problem! Next Spring will also be an excellent time to eliminate the new sprouts. However, have you ever given any serious thought as to "HOW" this plant has been traveling up the Rainy Creek road corridor?

In years gone by all of us, local folks, were responsible for the invasion of "knap weed" another noxious weed, to the Rainy creek drainage. We came in our vehicles as visitors, loggers, hikers, berry pickers, miners, contractors, wood cutters, hunters. You name it Ms. Lavelle. We were there!

But now, there is a gate and NOBODY who is not authorized to do so goes up that drainage. Nobody! except the trucks who haul the contaminated waste from the Libby Superfund Site to the mine site. So, if the seed from the "Tansy" is on the trucks going up the road, could it be at all possible for contaminated soil to be dropping along not only the Rainy Creek Road but everywhere else those trucks are traveling.

This problem started somewhere other than in Rainy Creek itself, after the road was gated off. Since the last five years to be exact!

When I talked to Mr. Kettlelapper, early last Fall, his comment was simply "There are all kinds of ways that weed could have been introduced to that location. Perhaps you might approach him for some constructive thoughts on his part.

Please check out whether or not you folks are creating an exposure pathway on the Rainy Creek Road with contaminated soil that is coming off those trucks! The analogy is very simple. If the Tansy seed is coming off then contaminated soil is coming off as well. If it is, then we have a problem in OU-2 relating to multiple pathways. that still exist!

Please include this letter in the Public Comments for the Proposed OU-2.

*Mel & Lerah Parker*











